Dear Dr Nicoll,

**RE: FUTURE DIRECTIONS FOR TEQSA, SECTOR DISCUSSION PAPERS**

On behalf of TAFE Directors Australia (TDA) and our member TAFE Higher Education Providers (HEP), I would like to thank you for the opportunity to respond to the two TEQSA Sector Discussion Papers.

TDA recently established the Australian TAFE HEP Network to provide our member HEPs nationally with the opportunity to benchmark their delivery and to collaborate in their response to policy and regulatory initiatives aimed at improving the sector and student experience. TDA’s submission to TEQSA incorporates the views of the HEP Network members.

In broad terms TDA welcomes TESQA’s proposals to streamline its regulatory processes and to ease the administrative impost on higher education providers. TDA however offers the following comments on the TEQSA Discussion Papers.

1. **Balance – Risk while achieving quality and innovation**

With projections for increased demand for higher education in the near future – especially focussed in areas of industry demand for more specialist technical programs in higher qualifications -- we are encouraged that TEQSA’s review of regulatory mechanisms may deliver greater consistency in quality approaches to how university and non-university providers approach regulation. I refer to mechanisms that effectively manage risks – yet do not discriminate -- the balance of quality of delivery while also achieving innovation and diversity.

2. **Issues for Review**

TDA strongly advocates for a review of current arrangements that brings more discerning and transparent differentiation within a quality higher education sector for students, especially those who may be better suited to alternative pathways to higher education than those traditionally provided through universities.

TDA argues that, for TEQSA to achieve its aim to strengthen risk-based regulation of the higher education sector:

- **The Review of Threshold Standards** should be brought into alignment with the current review of the demand driven funding system (and uncapped places) being undertaken by Mr Andrew Norton and the Hon. Dr David Kemp. TDA believes that TEQSA’s proposed date of 2015 or later for the implementation of any revised standards will be detrimental to the sector;
A category for public non-university providers should be established in the Higher Education Provider Standards. TAFE Institutes are highly governed organisations accountable to state governments and should be recognised as low risk, high quality providers as a result;

The regulatory frameworks and procedures of TEQSA and ASQA should be more aligned to reduce the regulatory burden for all providers. Currently there are four regulatory bodies with four different regulatory frameworks impacting on the operations of providers depending on the scope and scale of their provision.

In regard to this issue, TDA has distributed a discussion paper (Attachment A) to appropriate peak bodies for discussion about how to reduce the complexity and cost of these regulatory impost. This paper outlines a potential integrated risk management framework for your information.

After consultation with our TAFE HEP Network, please find TDA’s response to each of the Sector discussion papers attached.

I look forward to further discussions.

Yours sincerely

MARTIN RIORDAN
Chief Executive Officer
TAFE Directors Australia

Enclosures:

1. TDA Response to: Future Directions for TEQSA’s Regulatory processes, sector discussion paper
2. tda rESpONSE TO: Future Directions for TEQSA’s regulatory risk framework, sector discussion paper
3. Attachment a: comprehensive risk management for vet and higher education providers.